

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

YITZCHOK ROKOWSKY, on behalf of	:	
himself and all others similarly situated,	:	
	:	
Plaintiff,	:	Case No. 1:20-cv-456
	:	
v.	:	
	:	
VERICITY, INC.; MEMBERS MUTUAL;	:	Honorable Andrea R. Wood
FIDELITY LIFE ASSOCIATION; and APEX	:	
HOLDCO L.P., ERIC RAHE, CALVIN	:	
DONG, SCOTT PERRY, RICHARD	:	
HEMMINGS, JAMES E. HOHMANN,	:	
JAMES SCHACT, LINDA WALKER	:	
BYNOE, STEVEN GROOT, JOHN	:	
FIBIGER, AND NEIL ASHE	:	
	:	
Defendants.	:	

**UNOPPOSED MOTION FOR LEAVE TO FILE A MEMORANDUM
OF LAW IN EXCESS OF FIFTEEN PAGES**

Plaintiff Yitzchok Rokowsky moves under Local Rule 7.1 to file a brief in excess of 15 pages (specifically, no more than 25 pages) in support of his forthcoming opposition to Defendants' motion to dismiss the Complaint.

1. Plaintiff's Complaint asserts 5 separate counts against 14 different defendants. The Complaint asserts putative class claims in connection with the demutualization of Members Mutual Holding Company.

2. Under Local Rule 7.1, a memorandum of law is limited to 15 pages without prior leave of Court.

3. On May 29, 2020, the Court granted Defendants leave to file a single memorandum of law in support of their motion to dismiss in excess of 15 pages, but not to exceed 25 pages. Dkt. No. 31.

4. Given the number and extent of the arguments in Defendants' motion to dismiss, Plaintiff respectfully requests leave to file a memorandum of law in opposition to Defendants' motion to dismiss of up to 25 pages.

5. Before filing this motion, Plaintiff's counsel conferred with Defendants' counsel, who consented to this request.

WHEREFORE, Plaintiff respectfully requests that this Court grant him leave to file a memorandum of law in opposition to Defendants' motion to dismiss of no more than 25 pages.

Date: June 16, 2020

Respectfully submitted,

By: /Mark R. Miller
Edward A. Wallace
Mark R. Miller
WEXLER WALLACE, LLP
55 W Monroe St
Suite 3300
Chicago, IL 60603
(312) 346-2222
eaw@wexlerwallace.com
mrm@wexlerwallace.com

**SALTZ MONGELUZZI
BARRETT & BENDESKY, P.C.**
Simon B. Paris
Patrick Howard
Charles J. Kocher
1650 Market Street, 52nd Floor
Philadelphia, PA 19013
215.496.8282
215.496.0999 (fax)
Sparis@smbb.com
Phoward@smbb.com
Ckocher@smbb.com

ROGERS CASTOR
Lance Rogers
Daniel J. Mirarchi
26 E. Athens Ave.

Ardmore, PA 19003
610-649-1880
877-649-1880 (fax)
Lance@RogercCastor.com
Dan@RogersCastor.com

GUSTAFSON GLUEK PLLC

Daniel E. Gustafson
Raina Borrelli
Canadian Pacific Plaza
120 South Sixth Street, Suite 2600
Minneapolis, MN 55402
(612) 333-8844
DGustafson@gustafsongluek.com
RBorrelli@gustafsongluek.com

BONI, ZACK & SNYDER LLC

Michael J. Boni
Joshua D. Snyder
15 St. Asaphs Road
Bala Cynwyd, PA 19004
(610) 822-0200
(610) 822-0206 (fax)
mboni@bonizack.com
jsnyder@bonizack.com